

Appl. No. 10/005,972
Response Dated May 2, 2006
Reply to Office Action of February 2, 2006

REMARKS

Claims 1-28 are pending in this application. Although Applicant disagrees with the broad grounds of rejection set forth in the Office Action, Applicant has amended the claims in order to facilitate prosecution on the merits. No new matter has been added. Favorable reconsideration and allowance of the pending claims are respectfully requested.

35 U.S.C. § 102(b) Rejection

Claims 1-4, 8, 9, 13-18, and 22-28 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6, 119, 171 to Alkhatib ("Alkhatib")¹. Applicant respectfully traverses the rejection.

Applicant respectfully submits that to anticipate a claim under 35 U.S.C. § 102(b), the cited reference must teach every element of the claim. *See e.g.*, MPEP § 2131. Among other things, Alkhatib clearly fails to teach or suggest translating an external address to an internal address based on matching security identifiers. For at least this reason, among others, Applicant submits that Alkhatib fails to teach each and every element recited in amended independent claims 1, 9, 15, 17, 22 and 26, and that such claims are allowable. Furthermore, Applicant submits that claims 2-4, 8, 13, 14, 16, 18, 23-25, 27, and 28 are allowable by virtue of their dependency, as well as on their own merits.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. § 102(b) rejection of claims 1-4, 8, 9, 13-18, and 22-28.

¹ Although the Office Action lists claims 1-28 as being rejected under §102(b), Applicant believes the Examiner intended to list claims 1-4, 8, 9, 13-18, and 22-28 since claims 5-7, 10-12, and 19-21 are rejected on different grounds under §103(a).

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35 U.S.C. § 103(a) Rejection

Claims 5-7, 10-12, and 19-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Alkhatib in view of EP 1130846 A2 ("Nexland"). Applicant respectfully traverses the rejection.

Claims 5-7, 10-12, and 19-21 depend from one of amended independent claims 1, 9, 15, and 17. The Alkhatib reference fails to disclose all the elements of amended independent claims 1, 9, 15, and 17, as previously discussed. Furthermore, Nexland also fails to teach or suggest translating an external address to an internal address based on matching security identifiers. For at least this reason, among others, Applicant submits that independent claims 1, 9, 15, and 17, as well as dependent claims 5-7, 10-12, and 19-21, are non-obvious and patentable over Alkhatib and Nexland, whether taken alone or in combination.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. § 103(a) rejection of claims 5-7, 10-12, and 19-21.

Conclusion

It is believed that claims 1-28 are in allowable form. Accordingly, a timely Notice of Allowance to this effect is earnestly solicited.

Applicant does not otherwise concede, however, the correctness of the Office Action's rejection with respect to any of the dependent claims discussed above. Accordingly, Applicant hereby reserves the right to make additional arguments as may be necessary to further distinguish the dependent claims from the cited references, taken alone or in combination, based on additional features contained in the dependent claims


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that were not discussed above. A detailed discussion of these differences is believed to be unnecessary at this time in view of the basic differences in the independent claims.

The Examiner is invited to contact the undersigned at 724-933-5529 to discuss any matter concerning this application.

Respectfully submitted,

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Under 37 CFR 1.34(a)

Dated: May 2, 2006

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